

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN DOE,	:	<i>Amended Complaint Filed 1/7/20</i>
	Plaintiff :	
	:	No. 1:18-CV-1370-JEJ
v.	:	
	:	Hon. John E. Jones, III
JOSH SHAPIRO, <i>et al.</i> ,	:	
Defendants	:	FILED UNDER SEAL

**JOINT MOTION TO AMEND CAPTION, REDACT
PERSONAL IDENTIFIERS, AND UNSEAL CASE**

Pursuant to Rule 7(b) of the Federal Rules of Civil Procedure, Plaintiff, Defendants, and Intervenors respectfully move the Court to amend the caption, allow parties to redact personal identifiers, and have the case unsealed. In support thereof, the parties state as follows:

1. Plaintiff, Defendants, and Intervenors agree, that in the interest of the full administration of justice, the caption of this case should be amended to: JOHN DOE v. JOSH SHAPIRO, in his official capacity as Attorney General of Pennsylvania; MATTHEW FOGAL, in his official capacity as District Attorney of Franklin County, Pennsylvania; BRIAN SINNETT, in his official capacity as District Attorney of Adams County, Pennsylvania; DAVID W. SUNDAY, JR., in his official capacity as District Attorney of York County, Pennsylvania; and HEATHER ADAMS, in her official capacity as District Attorney of Lancaster County, Pennsylvania.

2. Plaintiff,¹ Defendants and Intervenor further agree to adopt the unsealing and redacting practice employed by the Third Circuit in relation to this case, as reflected in paragraphs 3 and 4, and as modified by paragraph 5 below.

3. It is agreed that the case should be unsealed; however, all information which would reveal the identity of Mr. Doe shall be redacted before filing on the public docket. The parties agree to provide un-redacted copies of all redacted filings to the court for docketing under seal.

4. Redaction will include all personal identification information and facts which would allow the identity of the Plaintiff to be identified, such as:

- a. Plaintiff's name,
- b. Plaintiff's address, and
- c. the factual allegations relating to Plaintiff's alleged criminal offense and subsequent charge.

5. The parties agree not to redact the section of the crimes code that Plaintiff was cited with.

¹ Plaintiff is a party to the present motion but maintains he also has the right to disclose publicly that he was the subject of an investigation by the Pennsylvania Department of Education and any information learned in connection therewith. Plaintiff contends that the Court should unseal the record *in toto* but joins the present motion without prejudice to such position.

WHEREFORE, the parties and intervenors respectfully request the Court amend the caption as reflected in paragraph 1 above, allow redaction as laid out in paragraphs 2, 4 and 5 above, and unseal the matter as laid out in paragraphs 2 and 3 above.

Respectfully submitted,

JOSH SHAPIRO
Attorney General

By: /s/ Keli M. Neary

KELI M. NEARY
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Date: May 5, 2020

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CERTIFICATE OF CONCURRENCE

I, Keli M. Neary, Executive Deputy Attorney General, counsel for Defendant Shapiro, hereby verify that counsel for all parties concur in the foregoing Joint Motion to Amend Caption, Redact Personal Identifiers, and Unseal Case.

/s/ Keli M. Neary
KELI M. NEARY
Executive Deputy Attorney General

DATE: May 5, 2020

CERTIFICATE OF SERVICE

I, Keli M. Neary, Executive Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on May 5, 2020, I caused to be served a true and correct copy of the foregoing document titled **Joint Motion to Amend Caption, Redact Personal Identifiers, and Unseal Case** to the following via email transmission:

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